

**Jan 25, 2023**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
23-20033-CR-GAYLES/TORRES  
CASE NO. \_\_\_\_\_**

**18 U.S.C. § 1029(b)(2)  
18 U.S.C. § 1029(a)(3)  
18 U.S.C. § 1028A(a)(1)  
18 U.S.C. § 982(a)(2)(B)  
18 U.S.C. § 1029(c)(1)(C)**

**UNITED STATES OF AMERICA**

**vs.**

**ERIC CADET,  
a/k/a "Exo,"  
KERBY JOSEPH,  
a/k/a "Migo,"  
JEAN SAINT FORD,  
a/k/a "Jean Pierre,"  
JOVIS ST LUC,  
WILMINGTON TOUISSANT,  
a/k/a "Will,"  
JERRY VERNELUS,  
a/k/a "John Ferrari," and  
DAMIAN WOODARD,  
a/k/a "Damo,"**

**Defendants.**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1  
Conspiracy to Commit Access Device Fraud  
(18 U.S.C. § 1029(b)(2))**

Beginning at least as early as in or around July 2020, the exact date being unknown to the Grand Jury, and continuing through in or around April 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**ERIC CADET,**  
**a/k/a "Exo,"**  
**KERBY JOSEPH,**  
**a/k/a "Migo,"**  
**JEAN SAINT FORD,**  
**a/k/a "Jean Pierre,"**  
**JOVIS ST LUC,**  
**WILMINGTON TOUISSANT,**  
**a/k/a "Will,"**  
**JERRY VERNELUS,**  
**a/k/a "John Ferrari,"**  
**DAMIAN WOODARD,**  
**a/k/a "Damo,"**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to commit violations of Title 18, United States Code, Section 1029(a), namely:

(a) to knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(3).

**ACTS IN FURTHERANCE OF THE CONSPIRACY**

In furtherance of the conspiracy, at least one of the co-conspirators committed and caused to be committed, in the Southern District of Florida, and elsewhere, at least one of the following acts, among others:

1. On or about July 29, 2020, **JOVIS ST LUC** sent a text message to **ERIC CADET, a/k/a "Exo,"** containing a photograph including social security numbers belonging to other persons without their permission, knowledge, or authority.

2. On or about July 30, 2020, **ERIC CADET, a/k/a "Exo,"** sent a text message to **JOVIS ST LUC** containing a photograph of a debit card issued to "T.J.," including a debit card number ending in 1956, without the permission, knowledge, or authority of "T.J."

3. From on or about July 30, 2020, and continuing through on or about August 2, 2020, **JEAN SAINT FORD, a/k/a "Jean Pierre,"** and **DAMIAN WOODARD, a/k/a "Damo,"** exchanged text messages regarding fraudulently completing a claim for unemployment assistance.

4. On or about August 2, 2020, **JEAN SAINT FORD, a/k/a "Jean Pierre,"** sent a text message to **DAMIAN WOODARD, a/k/a "Damo,"** containing a credit or debit card account number issued to another person without that person's permission, knowledge, or authority.

5. From on or about October 29, 2020, and continuing through on or about November 4, 2020, **ERIC CADET, a/k/a "Exo," JOVIS ST LUC, JERRY VERNELUS, a/k/a "John Ferrari," DAMIAN WOODARD, a/k/a "Damo,"** and other co-conspirators exchanged text messages wherein credit and debit account numbers issued to other persons were requested and shared.

6. On or about November 1, 2020, **JERRY VERNELUS, a/k/a "John Ferrari,"** and **ERIC CADET, a/k/a "Exo,"** exchanged text messages regarding darknet marketplaces selling stolen login credentials, including usernames and passwords for bank accounts, online payment accounts, mobile phone accounts, retailer accounts, and other online accounts.

7. On or about November 1, 2020, **JERRY VERNELUS, a/k/a "John Ferrari,"** and **ERIC CADET, a/k/a "Exo,"** exchanged text messages regarding a scheme to fraudulently purchase or obtain gift cards.

8. On or about November 16, 2020, **ERIC CADET, a/k/a “Exo,”** sent a text message to **WILMINGTON TOUSSAINT, a/k/a “Will,”** containing a photograph of a debit card issued to “D.S.”, including a debit card number ending in 3129, without the permission, knowledge, or authority of “D.S.”

9. On or about November 18, 2020, **WILMINGTON TOUSSAINT, a/k/a “Will,”** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers, credit card numbers, and debit card numbers issued to other persons, including individuals “B.L.”, “L.G.”, “M.S.”, “N.M.”, “R.G.”, “R.K.”, and “S.H.”

10. On or about November 19, 2020, **JERRY VERNELUS, a/k/a “John Ferrari,”** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers, credit card numbers, and debit card numbers issued to other persons, including individuals “J.R.”, “K.B.”, “L.H.”, and “K.P.”

11. From on or about December 26, 2020, and continuing through on or about December 28, 2020, **KERBY JOSEPH, a/k/a “Migo,”** and **ERIC CADET, a/k/a “Exo,”** exchanged text messages regarding a scheme aimed at tricking victims into providing personal identification information, including usernames, pin numbers, and social security numbers.

12. From on or about December 26, 2020, and continuing through on or about December 28, 2020, **ERIC CADET, a/k/a “Exo,”** sent text messages to **KERBY JOSEPH, a/k/a “Migo,”** containing credit and debit card account numbers issued to other persons without their permission, knowledge, or authority.

13. On or about December 29, 2020, **KERBY JOSEPH, a/k/a “Migo,”** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers,

credit card numbers, and debit card numbers issued to other persons, including individuals “S.R.”, “M.R.”, “C.S.”, “L.M.”, “K.H.”, “J.H.”, and “J.M.”

14. On or about January 5, 2021, **JEAN SAINT FORD, a/k/a “Jean Pierre,”** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers, credit card number, and debit card numbers issued to other persons, including individuals “A.H.”, “J.B.”, “K.P.”, “S.Y.”, “S.J.”, and “T.I.”

15. On or about January 5, 2021, **DAMIAN WOODARD, a/k/a “Damo,”** sent text messages to **WILMINGTON TOUSSAINT, a/k/a “Will,”** containing credit and debit card account numbers issued to other persons without their permission, knowledge, or authority.

16. On or about February 12, 2021, **ERIC CADET, a/k/a “Exo,”** sent text messages to **DAMIAN WOODARD, a/k/a “Damo,”** containing credit and debit card account numbers issued to other persons without their permission, knowledge, or authority.

17. On or about February 24, 2021, **ERIC CADET, a/k/a/ “Exo,”** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers, credit card numbers, and debit card numbers issued to other persons, including individuals “K.S.”, “C.V.”, “K.P.”, “S.M.”, “K.P/K.S.”, “Z.A.”

18. On or about April 12, 2021, **ERIC CADET, a/k/a “Exo,”** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers, credit card numbers, and debit card numbers issued to other persons, including individuals “K.B.”, J.T.”, and “J.F.T.”

19. On or about April 12, 2021, **DAMIAN WOODARD, a/k/a “Damo,”** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers,

credit card numbers, and debit card numbers issued to other persons, including individuals “K.B.”, “J.J.”, “J.T.”, and “C.W.”

20. On or about April 25, 2021, **JOVIS ST LUC** maintained in his possession fifteen (15) or more unauthorized access devices, that is, social security numbers, credit card numbers, and debit card numbers issued to other persons, including individuals “A.D.”, “D.L.”, “E.H.”, “G.P.”, “T.S.”, and “A.G.”

All in violation of Title 18, United States Code, Section 1029(b)(2).

**COUNT 2**  
**Possession of Fifteen or More Unauthorized Access Devices**  
**(18 U.S.C. § 1029(a)(3))**

On or about April 12, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ERIC CADET,**  
**a/k/a “Exo,”**

did knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, social security numbers, driver’s license numbers, and credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

**COUNTS 3-5**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A(a)(1))**

On or about April 12, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ERIC CADET,**  
**a/k/a “Exo,”**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen (15) or more unauthorized access devices, said conduct affecting interstate and foreign commerce, as charged in Count 2 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person as set forth below:

Count	Means of Identification
3	Name and credit or debit card account number ending in 6643 issued in the name of "K.B."
4	Name and social security number of "J.F.T."
5	Name and social security number of "J.T."

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT 6**  
**Possession of Fifteen or More Unauthorized Access Devices**  
**(18 U.S.C. § 1029(a)(3))**

On or about December 29, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**KERBY JOSEPH,**  
**a/k/a "Migo,"**

did knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, social security numbers, driver's license numbers, and credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

**COUNTS 7-13**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A(a)(1))**

On or about December 29, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**KERBY JOSEPH,**  
**a/k/a “Migo,”**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen (15) or more unauthorized access devices, said conduct affecting interstate and foreign commerce, as charged in Count 6 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person as set forth below:

<b>Count</b>	<b>Means of Identification</b>
7	Name and social security number of “S.R.”
8	Name and social security number of “M.R.”
9	Name and social security number of “C.S.”
10	Name and social security number of “L.M.”
11	Name and social security number of “K.H.”
12	Name and social security number of “J.H.”
13	Name and social security number of “J.M.”

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.



**COUNT 14**  
**Possession of Fifteen or More Unauthorized Access Devices**  
**(18 U.S.C. § 1029(a)(3))**

On or about January 5, 2021, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendant,

**JEAN SAINT FORD,**  
**a/k/a “Jean Pierre,”**

did knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, social security numbers, driver’s license numbers, and credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

**COUNTS 15-20**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A(a)(1))**

On or about January 5, 2021, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendant,

**JEAN SAINT FORD,**  
**a/k/a “Jean Pierre,”**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen (15) or more unauthorized access devices, said conduct affecting interstate and foreign commerce, as charged in Count 14 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person as set forth below:

Count	Means of Identification
15	Name and social security number of "A.H."
16	Name and social security number of "J.B."
17	Name and social security number of "K.P."
18	Name and social security number of "S.Y."
19	Name and social security number of "S.J."
20	Name and social security number of "T.I."

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT 21**  
**Possession of Fifteen or More Unauthorized Access Devices**  
**(18 U.S.C. § 1029(a)(3))**

On or about August 25, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JOVIS ST LUC,**

did knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, social security numbers, driver's license numbers, and credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

**COUNTS 22-27**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A(a)(1))**

On or about August 25, 2021, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendant,

**JOVIS ST LUC,**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen (15) or more unauthorized access devices, said conduct affecting interstate and foreign commerce, as charged in Count 21 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person as set forth below:

<b>Count</b>	<b>Means of Identification</b>
22	Name and social security number of "A.D."
23	Name and social security number of "D.L."
24	Name and social security number of "E.H."
25	Name and social security number of "G.P."
26	Name and social security number of "T.S."
27	Name and social security number of "A.G."

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT 28**  
**Possession of Fifteen or More Unauthorized Access Devices**  
**(18 U.S.C. § 1029(a)(3))**

On or about November 18, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**WILMINGTON TOUISSANT,**  
**a/k/a “Will,”**

did knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, social security numbers, driver’s license numbers, and credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

**COUNTS 29-35**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A(a)(1))**

On or about November 18, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**WILMINGTON TOUISSANT,**  
**a/k/a “Will,”**

during and in relation to, a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen (15) or more unauthorized access devices, said conduct affecting interstate and foreign commerce, as charged in Count 29 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person as set forth below:

Count	Means of Identification
29	Name and social security number of "B.L."
30	Name and social security number of "L.G."
31	Name and social security number of "M.S."
32	Name and social security number of "N.M."
33	Name and social security number of "R.G."
34	Name and social security number of "R.K."
35	Name and social security number of "S.H."

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT 36**  
**Possession of Fifteen or More Unauthorized Access Devices**  
**(18 U.S.C. § 1029(a)(3))**

On or about November 19, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JERRY VERNELUS,**  
**a/k/a "John Ferrari,"**

did knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, social security numbers, driver's license numbers, and credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

**COUNTS 37-40**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A(a)(1))**

On or about November 19, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**JERRY VERNELUS,**  
**a/k/a “John Ferrari,”**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen (15) or more unauthorized access devices, said conduct affecting interstate and foreign commerce, as charged in Count 37 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person as set forth below:

Count	Means of Identification
37	Name and social security number of “J.R.”
38	Name and social security number of “K.B.”
39	Name and social security number of L.H.”
40	Name and credit or debit card account number ending in 2896 issued in the name of “K.P.”

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT 41**  
**Possession of Fifteen or More Unauthorized Access Devices**  
**(18 U.S.C. § 1029(a)(3))**

On or about April 12, 2021, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendant,

**DAMIAN WOODARD,**  
**a/k/a “Damo,”**

did knowingly, and with intent to defraud, possess fifteen (15) or more unauthorized access devices, that is, social security numbers, driver’s license numbers, and credit and debit card account numbers issued to other persons, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

**COUNTS 42-45**  
**Aggravated Identity Theft**  
**(18 U.S.C. § 1028A(a)(1))**

On or about April 12, 2021, in Miami-Dade County, in the Southern District of Florida,  
and elsewhere, the defendant,

**DAMIAN WOODARD,**  
**a/k/a “Damo,”**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), that is, knowingly, and with intent to defraud, possessing fifteen (15) or more unauthorized access devices, said conduct affecting interstate and foreign commerce, as charged in Count 42 of this Indictment, did knowingly possess, without lawful authority, the means of identification of another person as set forth below:

Count	Means of Identification
42	Name and social security number of "K.B."
43	Name and social security number of "J.J."
44	Name and social security number of "J.T."
45	Name and social security number of "C.W."

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

### **FORFEITURE ALLEGATIONS**

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendants, **ERIC CADET, a/k/a "Exo," KERBY JOSEPH, a/k/a "Migo," JEAN SAINT FORD, a/k/a "Jean Pierre," JOVIS ST LUC, WILMINGTON TOUISSANT, a/k/a "Will," JERRY VERNELUS, a/k/a "John Ferrari," and DAMIAN WOODARD, a/k/a "Damo,"** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1029, as alleged in this Indictment, the defendants shall forfeit to the United States of America: (a) all property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such violation, pursuant to Title 18, United States Code, Section 982(a)(2)(B); and (b) any personal property used, or intended to be used, to commit such offense, pursuant to Title 18, United States Code, Section 1029(c)(1)(C).

3. The property which is subject to forfeiture includes a forfeiture money judgment in



the amount of the value of any property that constitutes or is derived from proceeds obtained as a result of the offenses, and any personal property that was used or intended to be used to commit or facilitate the commission of the offenses.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2).

A TRUE BILL

FOREPERSON

*ru*  
  
MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

*EL*  
  
ELENA SMUKLER  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.:

v.

**CERTIFICATE OF TRIAL ATTORNEY\***

ERIC CADET, a/k/a "Exo," et al.,

**Superseding Case Information:**

Defendants.

Court Division (select one)

- ☒ Miami      ☐ Key West      ☐ FTP  
☐ FTL      ☐ WPB

New Defendant(s) (Yes or No)

Number of New Defendants

Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No  
List language and/or dialect:
4. This case will take 7 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  

(Check only one)	(Check only one)
I <input type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input checked="" type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge Case No.
7. Has a complaint been filed in this matter? (Yes or No) No  
If yes, Magistrate Case No.
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge Case No.
9. Defendant(s) in federal custody as of
10. Defendant(s) in state custody as of
11. Rule 20 from the District of
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No

By:



for Elena Smukler

Assistant United States Attorney

FLA Bar No. 91025

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ERIC CADET, a/k/a "Exo"

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2) and (a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Count #: 2

Possession of Fifteen or More Unauthorized Access Devices

Title 18, United States Code, Section 1029(a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Counts #: 3-5

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

- \* **Max. Term of Imprisonment:** 2 years' mandatory imprisonment (consecutive to any other sentence)
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years' minimum imprisonment
- \* **Max. Supervised Release:** 1 year supervised release
- \* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: KERBY JOSEPH, a/k/a "Migo"

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2) and (a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Count #: 6

Possession of Fifteen or More Unauthorized Access Devices

Title 18, United States Code, Section 1029(a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Counts #: 7-13

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

- \* **Max. Term of Imprisonment:** 2 years' mandatory imprisonment (consecutive to any other sentence)
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years' minimum imprisonment
- \* **Max. Supervised Release:** 1 year supervised release
- \* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JEAN SAINT FORD, a/k/a "Jean Pierre"

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2) and (a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Count #: 14

Possession of Fifteen or More Unauthorized Access Devices

Title 18, United States Code, Section 1029(a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Counts #: 15-20

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

- \* **Max. Term of Imprisonment:** 2 years' mandatory imprisonment (consecutive to any other sentence)
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years' minimum imprisonment
- \* **Max. Supervised Release:** 1 year supervised release
- \* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** JOVIS ST LUC

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2) and (a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Count #: 21

Possession of Fifteen or More Unauthorized Access Devices

Title 18, United States Code, Section 1029(a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Counts #: 22-27

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

- \* **Max. Term of Imprisonment:** 2 years' mandatory imprisonment (consecutive to any other sentence)
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years' minimum imprisonment
- \* **Max. Supervised Release:** 1 year supervised release
- \* **Max. Fine:** \$250,000

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: WILMINGTON TOUISSANT, a/k/a "Will"

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2) and (a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Count #: 28

Possession of Fifteen or More Unauthorized Access Devices

Title 18, United States Code, Section 1029(a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Counts #: 29-35

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

- \* **Max. Term of Imprisonment:** 2 years' mandatory imprisonment (consecutive to any other sentence)
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years' minimum imprisonment
- \* **Max. Supervised Release:** 1 year supervised release
- \* **Max. Fine:** \$250,000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JERRY VERNELUS, a/k/a "John Ferrari"

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2) and (a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Count #: 36

Possession of Fifteen or More Unauthorized Access Devices

Title 18, United States Code, Section 1029(a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Counts #: 37-40

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

- \* **Max. Term of Imprisonment:** 2 years' mandatory imprisonment (consecutive to any other sentence)
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years' minimum imprisonment
- \* **Max. Supervised Release:** 1 year supervised release
- \* **Max. Fine:** \$250,000



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** DAMIAN WOODARD, a/k/a "Damo"

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to Commit Access Device Fraud

Title 18, United States Code, Section 1029(b)(2) and (a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Count #: 41

Possession of Fifteen or More Unauthorized Access Devices

Title 18, United States Code, Section 1029(a)(3)

- \* **Max. Term of Imprisonment:** 10 years' imprisonment
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years' supervised release
- \* **Max. Fine:** \$250,000

Counts #: 42-45

Aggravated Identity Theft

Title 18, United States Code, Section 1028A(a)(1)

- \* **Max. Term of Imprisonment:** 2 years' mandatory imprisonment (consecutive to any other sentence)
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 2 years' minimum imprisonment
- \* **Max. Supervised Release:** 1 year supervised release
- \* **Max. Fine:** \$250,000